

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FILED

JAN 21 2011

CLERK, U.S. DISTRICT COURT

By \_\_\_\_\_ Deputy

UNITED STATES OF AMERICA

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§

v.

CRIMINAL COMPLAINT  
CASE NO. 4:11-MJ-016

SHAWN DANIEL SERFASS (1)

CRIMINAL COMPLAINT

Possession of a Controlled Substance With Intent to Distribute

*On or about October 13<sup>th</sup>, 2010, in the Fort Worth Division of the Northern District of Texas, the defendant did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of Methamphetamine, a Schedule II Controlled Substance,*

*in violation of Title 21 United States Code, Sections 841(a)(1) & (b)(1)(C).*

I, Kevin Brown, am a Task Force Officer of the Drug Enforcement Administration and this complaint is based on the following facts, which are true to the best of my knowledge:

1. On October 13, 2010, Investigators established surveillance at 2508 Ridgmar Ave., apartment #18, Fort Worth, Texas. During the surveillance, Investigators observed Shawn SERFASS arrive at the apartment complex and go to apartment #18.
2. At approximately 5:38 p.m., SERFASS was seen exiting apartment #18. Investigators attempted to maintain surveillance on SERFASS, however; lost sight of SERFASS for a few minutes. At approximately 5:48 p.m., Investigators re-established surveillance on SERFASS in the Office Depot parking lot located at 6680 West Freeway, Fort Worth, Texas.
3. Investigators observed SERFASS enter I-30 eastbound and accelerate at a high rate of speed. Investigators observed SERFASS make numerous lane changes without utilizing his turn signal in an apparent attempt to distance himself from police.

4. At approximately 5:52 p.m., Fort Worth Police were able to catch up with SERFASS and initiate a traffic stop at 6037 Calmont Ave., Fort Worth, Texas. Fort Worth Police advised SERFASS why he had been stopped and asked SERFASS for Consent to Search his vehicle. SERFASS gave verbal consent. A Fort Worth K9 officer was also requested to assist in the traffic stop.

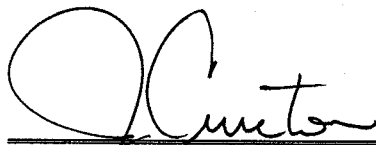
5. When the K9 Officer arrived at the traffic stop, he again asked SERFASS for consent to search his vehicle. SERFASS again gave verbal consent for officers to search the vehicle. The K9 was then deployed around and in the vehicle and alerted on the passenger compartment, the center console, and on a duffle bag located in the rear of the vehicle. Fort Worth Police removed the front center storage compartment bucket in the center console and located a clear baggy containing a crystal-like substance believed to be methamphetamine. The substance was transported to the Fort Worth Police Department where a field test yielded a positive result for methamphetamine with a gross weight of 49.8 gross grams.



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Kevin K. Brown  
DEA - Task Force Officer

Sworn to before me, and subscribed in my presence on January 21, 2011 at 2:46 p.m.,  
in Fort Worth, Texas.



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JEFFREY L. CURETON  
UNITED STATES MAGISTRATE JUDGE